



DEPARTMENT OF JUSTICE  
NEW CASTLE COUNTY  
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JOSEPH R. BIDEN, III  
ATTORNEY GENERAL

October 23, 2007

James St. Louis  
SBI # 446518  
Delaware Correctional Center  
1181 Paddock Road  
Smyrna, DE 19977

Re: **St. Louis v. Morris, et al.**  
**C.A. No. 06-236-SLR**

Dear Mr. St. Louis:

I am writing in reference to two motions you recently filed.

First, you have filed a Motion to Compel directed to Correctional Medical Services ("CMS") seeking production of your medical records. [D.I. 77]. I do not represent CMS, which is not a party to this action. Further, to date, you have not requested production of your medical records in the context of this litigation. However, as a courtesy, I have requested copies of your medical records and will forward them to you after I receive them.

Second, you filed a Motion to Compel directed to "Counselor Thompson." [D.I. 76]. Again, there is no "Counselor Thompson" named as a defendant in this matter. [D.I. 76]. You have attached to this Motion a copy of a letter, addressed only to "Counselor." In that letter, you ask for your "files." At the end of the letter, you indicate that you are putting "all counselors on notice as witnesses."

In your Request for Discovery Materials directed to Defendants, you previously sought production of your institutional file. Defendants responded, in part, that the information was protected from discovery by 11 *Del. C.* § 4322. To the extent that you are again requesting production of your institutional file materials, that information is protected pursuant to Section 4322.

Very truly yours,

*Eileen Kelly*  
Eileen Kelly  
Deputy Attorney General

cc: Clerk of the Court